

- 4) Defendant shall cooperate with Plaintiffs to produce the following evidence as detailed in Plaintiffs' brief in opposition to the motion to stay discovery, Doc. 145, p. 5:
- a. Supplementation of Bayada's document production with regard to how the compensation policies and practices challenged in this litigation are conveyed and/or applied in the six states with class claims.
 - b. Updated data on the number of potential class members in each putative state-law class asserted.
 - c. Production of employment documents for the six newly-added named Plaintiffs.
- 5) Plaintiffs are permitted to proceed with the six fact depositions previously noticed; but Plaintiffs must seek leave of the court to take any additional depositions prior to the early summary judgment motion deadline by showing good cause, unless the parties can otherwise agree.
- 6) The limited discovery detailed in paragraphs 4 and 5 of this order shall be completed by **August 28, 2020**.

s/Jennifer P. Wilson
JENNIFER P. WILSON
United States District Court Judge
Middle District of Pennsylvania